

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

New Hampshire Youth Movement,

Plaintiff,

v.

David M. Scanlan, in his official capacity as
New Hampshire Secretary of State,

Defendant.

Case No. 1:24-cv-00291-SE-TSM

MOTION FOR PROTECTIVE ORDER

Plaintiff New Hampshire Youth Movement hereby moves the Court to enter the proposed Protective Order attached as **Exhibit A** (“Protective Order”). Plaintiff acknowledges that, in the course of discovery, it may be required to provide and receive sensitive, private, personal, or otherwise confidential information not subject to public disclosure under New Hampshire law or other governing law. Defendant states that he will take no position on the entry of the Protective Order.

Pursuant to Local Rule 26.2, Plaintiff states that the Protective Order conforms to Civil Form 5, with the exception of three minor modifications: (1) to acknowledge that Defendant, rather than agreeing, takes no position on its entry; (2) to permit disclosures to counsel in *Open Democracy v. Scanlan*, 1:24-cv-00312-SE-TSM and specify that such counsel is bound by the terms of the Protective Order to the extent they receive documents produced in this action (*see* ¶ 5.b.6); and (3) to allow third-parties producing documents in response to subpoenas to designate documents as confidential (*see* ¶ 15).

Good cause therefore exists for entry of the Protective Order.

Dated: May 14, 2025

Respectfully submitted,

/s/ Steven J. Dutton

Steven J. Dutton, NH Bar No. 17101
Connor W. Harding, NH Bar No. 276438
McLANE MIDDLETON, P.A.
900 Elm Street Manchester,
New Hampshire 03101
Telephone: (603) 628-1377
steven.dutton@mclane.com
connor.harding@mclane.com

David R. Fox*
Marcos Mocine-McQueen*
Mark R. Haidar*
ELIAS LAW GROUP LLP
250 Massachusetts Ave NW, Suite 400
Washington, D.C. 20001
Telephone: (202) 968-4490
dfox@elias.law
mmcqueen@elias.law
mhaidar@elias.law

Tyler L. Bishop*
ELIAS LAW GROUP LLP
1700 Seventh Avenue, Suite 2100
Seattle, Washington 98101
(206) 656-0177
tbishop@elias.law

Counsel for Plaintiff

** Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 14th day of May 2025 on all parties of record via the Court's electronic filing system.

Dated: May 14, 2025

/s/ Steven J. Dutton